## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

GLC ON-THE-GO, INC., Civil Action No.: 2:23-cv-02031

Plaintiff,

٧.

BONAMOUR HEALTH GROUP & BONAMOUR HEALTH GROUP LLC, LAKEVIEW HEALTHCARE OPERATING LLC d/b/a LAKEVIEW HEALTHCARE & REHABILITATION CENTER and MULBERRY HEALTHCARE OPERATING LLC d/b/a MULBERRY HEALTHCARE & REHABILITATION CENTER.

Defendants.

## **REQUEST TO ENTER DEFAULT**

To the Clerk of the U.S. District Court for the Western District of Pennsylvania:

Please enter default against the above-captioned Defendants for failure to plead or otherwise defend as provided by the Federal Rules of Civil Procedure as appears from the affidavit of Gregg A. Guthrie, Esquire attached hereto.

Respectfully submitted

SUMMERS, McDonnell, Hudock, Guthrie & Rauch. P.C.

By:

Gregg A. Guthrie (Pa I.D. #59203)

Counsel for Plaintiff, GLC On-The-Go, Inc.

Brandy S. Lonchena

AND NOW, THIS DAY OF, 202	4 pursuant to request to enter
default and affidavit filed, default is hereby entered against the Defendants for failure to	
plead or otherwise defend.	CLERK'S ENTRY OF DEFAULT  Date: 2/1/2024
Clerk	Katie Hall Docket Clerk Brandy S. Lonchena

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GLC ON-THE-GO. INC.,

Civil Action No.: 2:23-cv-02031.

Plaintiff,

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LAKEVIEW HEALTHCARE OPERATING
LLC d/b/a LAKEVIEW HEALTHCARE &
REHABILITATION CENTER and
MULBERRY HEALTHCARE OPERATING
LLC d/b/a MULBERRY HEALTHCARE &
REHABILITATION CENTER.

Defendants.

## AFFIDAVIT FOR ENTRY OF DEFAULT

COMMONWEALTH OF PENNSYLVANIA	)
	)
COUNTY OF ALLEGHENY	)

I, Gregg A. Guthrie, Esquire, being duly sworn, state that I am the attorney of record for Plaintiff, GLC On-The-Go, Inc., in the above-captioned action; that the Complaint and Summons in this action was filed with the Clerk of Court on 11- 27- 2023; that Waivers of Service were sent by counsel for Plaintiff to each of the Defendants on 11-28-2023; that counsel for all Defendants executed and returned the Waivers of Service for each Defendant and filed the same with the Court on 12-14-2023; that pursuant to the Federal Rules of Civil Procedure, the Defendants were required to file an answer or otherwise respond to the Complaint on or before 1-29-2024; that each of the Defendants have failed to file an answer or otherwise respond to the Complaint before the deadline on 1-29-2024 expired; that the time permitted for the Defendants to answer or otherwise respond to the Complaint has not been extended; that none of the Defendants are a minor or

incompetent person; and that none of the Defendants are in the military service of the United States.

Bv:

Gregg A. Guthrie, Esquire (Pa I.D. #59203) Counsel for Plaintiff, GLC On-The-Go, Inc.

Sworn to and subscribed before me this

day of AMMANA

Notary Public

My commission expires:

Commonwealth of Pennsylvania - Notary Seat Rebecca D. Lisotto, Notary Public Allegheny County My commission expires March 5, 2026 Commission number 1324293

Member, Pennsylvania Association of Notaries